From: Robert Touchette [mailto:robie@citysavingsbank.com]
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To: Comments
Subject: Assessments, RIN 3064-AD35

To the FDIC:

- *Community banks are being unfairly penalized. Community banks didn't participate in the risky practices that led to the economic crisis, yet they are being penalized by having to pay this onerous special assessment on top of regular assessments that are more than double those of last year. The community banking industry is the bright spot in this current economic storm. The vast majority of community banks are well-capitalized, common-sense lenders that have been and want to continue to help in the economic recovery process in cities and towns throughout America. This special assessment will only hinder their ability to do so.*

- *Systemic-risk premium for the large banks. I support a systemic-risk premium for the large, "systemically important" banks. This premium should be large enough to pay for the substantial risk of insuring these institutions.*

- *Failing large banks will have access to TARP money to pay for the premium. It's unfair that so many of the large banks have received tens of billions of dollars of TARP money and will have the ability to use these taxpayer funds to pay this premium. Many of these larger bank's will pass on the increased costs to their customers, who in turn, will be paying increased taxes as well as increased fees.*

- *The FDIC should explore all alternatives for funding the DIF in lieu of the special assessment. There are many alternatives to funding the DIF in lieu of imposing a special assessment, including using its existing authority to borrow from the Treasury, issuing debt instruments to the public or using its authority to borrow from the banking industry. All of these alternatives should be thoroughly examined with community bank input.*

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